

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
VICINAGE OF TRENTON**

ANYCLO INTERNATIONAL INC., a corporation,

Plaintiff,

vs.

YANG-SUP CHA, an individual, NAM-HEE KIM, an individual, STAFFORD CHA, an individual, ANYCLO USA, INC., a corporation, MOJO MOTO, LLC, a corporation, JOHN DOES (1-20), JANE DOES (1-20) and ABC CORPORATIONS (1-10),

Defendants.

Civil Action

Case No. 3:18-CV-05759-PGS-LHG

**PLAINTIFF'S PROPOSED
JURY VOIR DIRE
QUESTIONS**

Document Electronically Filed.

**Trial Date (Fixed by Court):
July 24, 2023**

PLAINTIFF'S PROPOSED JURY VOIR DIRE QUESTIONS

1. This trial is expected to last for four (4) days until Friday, July 28, 2023. Is there anything about the length or scheduling of the trial that would interfere with your ability to serve?

2. Do you have any medical, personal or financial problem that would prevent you from serving on this jury?

3. Do any of you have a special need or require a reasonable accommodation to help you in listening, paying attention, reading printed materials, deliberating, or otherwise participating as a fair and impartial juror?

4. *Introduce the lawyers and the parties.* Do you know either of the lawyers representing the parties in this case? Has either of the lawyers or anyone in their office ever represented you or brought any action against you?

5. *Read names of potential witnesses.*

Dong Geun "Hopkins" Song

Cris Lee

Daniel Cho

Juda Srour

Yang-Sup Cha

Nam-hee Kim

Stafford Cha

Do you know any of the potential witnesses?

6. Do you know anything about this case from any source other than what I've just told you?

7. Do you work in the clothing and/or garment business? If so, have you ever conducted any business with Anyclo International, Inc. or Anyclo USA, Inc.?

8. Have you or any family member or close personal friend ever filed a claim or a lawsuit of any kind?

9. Has anyone ever filed a claim or a lawsuit against you or a member of your family or a close friend?

10. A plaintiff is a person or corporation [or other entity] who has initiated a lawsuit. Do you have a bias for or against a plaintiff simply because he or she has brought a lawsuit?

11. A defendant is a person or corporation [or other entity] against whom a lawsuit has been brought. Do you have a bias for or against a defendant simply because a lawsuit has been brought against a defendant?

12. If the law and evidence warranted, would you be able to render a verdict in favor of the plaintiff or defendant regardless of any sympathy you may have for either party?

13. Based on what I have told you, is there anything about this case or the nature of the claim itself, that would interfere with your ability to be fair and impartial and to apply the law as instructed by the court?

14. Can you accept the law as explained by the court and apply it to the facts regardless of your personal beliefs about what the law is or should be?

15. Have you ever served on a trial jury before today, in any state court or federal court?

16. Do you know anyone else in the jury box other than as a result of reporting here today?

17. Would your verdict in this case be influenced in any way by any factors other than the evidence in the courtroom such as friendships or family relationships or the type of work you do?

18. Have you ever been a witness in a civil matter, regardless of whether it went to trial?

19. Have you ever testified in any court proceeding?

20. You have answered a series of questions about civil trials and civil cases. Now we would like to learn a little bit about each of you. Please tell us the type of work you do; what is your educational history; who else lives in your household and the type of work they do, if any; which television shows you watch; any sources from which you learn the news; What you do in your spare time and anything else you feel is important?

21. Is there anything, whether or not covered in the previous questions, which would affect your ability to be a fair and impartial juror or in any way be a problem for you in serving on this jury?

22. Is there anything else that you feel is important for the parties in this case to know about you?

By: *s/Gregory J. Cannon*

Gregory J. Cannon Esq.
SOBEL HAN & CANNON, LLP
105 Reids Hill Road, Suite B
Aberdeen, New Jersey 07747
(201) 603-3697 (phone)
(646) 513-2648 (fax)
gcannon@sobelhan.com

DATED: June 29, 2023